

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

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**TERESA YOUNG,**

**Plaintiff,**

**v.**

**Case No. 2:19-cv-02384-TLP-dkv**

**DEPARTMENT OF THE TREASURY;  
IRS; AND STEVEN T. MNUCHIN, UNITED  
STATES SECRETARY OF THE TREASURY,**

**Defendants.**

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**DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION TO AMEND COMPLAINT  
WITH CASE MERGER AND JOIN PARTIES**

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**COME NOW**, Defendants Department of the Treasury; IRS; and Steven T. Mnuchin, United States Secretary of the Treasury, by and through undersigned counsel, and respond to Plaintiff's Motion to Amend Complaint with Case Merger and Join Parties (ECF No. 91), respectfully stating as follows:

The Defendants do not oppose Plaintiff's request to file the proposed amended complaint that was attached to Plaintiff's motion (ECF No. 91-1). Plaintiff included language in her motion, however, requesting that the present case be "joined" with a case that was pending before the EEOC. Because the language used in Plaintiff's motion suggests possible broader amendments, the Defendants request that the amendments be limited to those included in the proposed amendment complaint. The Defendants also ask that the Court direct Plaintiff to file the amended complaint within five (5) days of the entry of the Court's Order granting the request.

The Defendants oppose Plaintiff's request that she be granted a default judgment, and incorporate by reference their prior response on this issue (ECF No. 79).

The Defendants are not taking a position regarding Plaintiff's renewed request for the appointment of counsel.

Respectfully submitted,

D. MICHAEL DUNAVANT  
UNITED STATES ATTORNEY

By: /s/ M. Jason Martin  
M. Jason Martin (TN #27404)  
Monica M. Simmons-Jones (TN #18892)  
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**CERTIFICATE OF SERVICE**

I, M. Jason Martin, Assistant United States Attorney for the Western District of Tennessee, certify that the foregoing was filed via the Court's CM/ECF system and thereby served on Plaintiff, Teresa Young, this 9th day of January 2019.

/s/ M. Jason Martin  
M. Jason Martin  
ASSISTANT UNITED STATES ATTORNEY